

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Alto Maipo Delaware LLC, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 21-11507 (KBO)  
)  
) (Jointly Administered)  
)  
)  
)

**NOTICE OF AGENDA FOR HEARING SCHEDULED FOR  
APRIL 6, 2022 AT 12:30 P.M. (ET)**

*This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register no later than April 6, 2022 at 10:00 a.m. (ET).*

*Courtcall will not be used for this Hearing.*

*Please use the following link to register for this hearing:*

<https://debuscourts.zoomgov.com/meeting/register/vJltcuGqqj0qHbsA4O5rgSUnf4prHImBbaU>

*After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.*

**CONTESTED MATTERS GOING FORWARD**

1. Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement [[D.I. 341](#), 3/7/22]

Objection Deadline: March 17, 2022 at 4:00 p.m. (ET), extended for certain parties to March 22, 2022

Related Documents:

- A. Senior Lenders' Joinder and Statement in Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement [[D.I. 374](#), 3/17/22]

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

- B. Debtors' Motion for Leave to File Replies to Objections to the Disclosure Statement and Assumption of the Restructuring Support Agreement [[D.I. 439](#), 4/4/22]
- C. Reply in Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement [[D.I. 440](#), 4/4/22] [*pending Court approval of Motion for Leave*]
- D. Senior Lenders' (I) Joinder and Statement in Further Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement and (II) Response to Official Committee of Unsecured Creditors' Objection Thereto [[D.I. 442](#), 4/4/22]
- E. Cerberus' Joinder to Debtors' (I) Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement and (II) Reply to Official Committee of Unsecured Creditors' Objection Thereto [[D.I. 444](#), 4/4/22]

Objections Filed:

- A. Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement [[D.I. 387](#), 3/18/22]

Status: This matter will be going forward.

- 2. Debtors' Motion for an Order (I) Approving the Disclosure Statement, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures, and (IV) Granting Related Relief [[D.I. 369](#), 3/15/22]

Objection Deadline: March 29, 2022 at 4:00 p.m. (ET)

Related Documents:

- A. Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code [[D.I. 313](#), 2/28/22]
- B. Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code [[D.I. 314](#), 2/28/22]
- C. Notice of Hearing to Consider Approval of Disclosure Statement [[D.I. 315](#), 2/28/22]

- D. Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code [[D.I. 401](#), 3/22/22]
- E. Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code [[D.I. 402](#), 3/22/22]
- F. Notice of Filing of Blacklined Versions of (I) Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC and Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC [[D.I. 403](#), 3/22/22]
- G. Senior Lenders' Joinder to Debtors' Motion for an Order (I) Approving the Disclosure Statement, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures, and (IV) Granting Related Relief [[D.I. 425](#), 3/29/22]
- H. Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code [[D.I. 435](#), 4/4/22]
- I. Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code [[D.I. 436](#), 4/4/22]
- J. Notice of Filing of Blacklined Versions of I) Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC and (II) Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC [[D.I. 437](#), 4/4/22]
- K. Debtors' Motion for Leave to File Replies to Objections to the Disclosure Statement and Assumption of the Restructuring Support Agreement [[D.I. 439](#), 4/4/22]
- L. Debtors' Omnibus Reply in Support of Debtors' Motion for an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Voting Procedures, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures; and (IV) Granting Related Relief [[D.I. 441](#), 4/4/22] [*pending Court approval of Motion for Leave*]

- M. Senior Lenders' (I) Joinder and Statement in Further Support of Debtors' Motion for an Order (i) Approving the Disclosure Statement; (ii) Approving Solicitation and Voting Procedures including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures, and (IV) Granting Related Relief [[D.I. 443](#), 4/4/22]
- N. Cerberus' Joinder to Debtors' Motion for an Order (I) Approving the Disclosure Statement, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures, and (IV) Granting Related Relief [[D.I. 445](#), 4/4/22]
- O. Notice of Filing of Revised Proposed Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Voting Procedures, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures; and (IV) Granting Related Relief [[D.I. 446](#), 4/4/22]
- P. Joinder and Reply of AES Andes, S.A. and Norgener Renovables, SpA in Support of Approval of Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code and for Related Relief [[D.I. 448](#), 4/4/22]

Objections Received/Filed:

- A. United States Trustee's Objection to the Debtors' Motion for Entry of an Order Approving Disclosure Statement, Establishing Solicitation and Voting Procedures, and Granting Related Relief [[D.I. 427](#), 3/29/22]
- B. Official Committee of Unsecured Creditors' Objection to Debtors' Motion Seeking Approval of Disclosure Statement for the Joint Chapter 1 Plan of Reorganization of Alto Maipo SpA and Alto Maipo Delaware LLC Pursuant to Chapter 11 of the Bankruptcy Code and for Related Relief [[D.I. 430](#), 3/29/22]

Status: This matter will be going forward.

3. Debtors' Motion for Entry of an Order Extending the Exclusivity Periods for Filing a Chapter 11 Plan and Solicitation of Acceptances Thereof [[D.I. 373](#), 3/16/22]

Objection Deadline: March 29, 2022 at 4:00 p.m. (ET)

Related Documents: None

Objections Received/Filed:

- A. Senior Lenders' Reservation of Rights With Respect to Debtors' Motion for Entry of an Order Extending the Exclusivity Periods for Filing a Chapter 11 Plan and Solicitation of Acceptances Thereof [[D.I. 426](#), 3/29/22]

Status: This matter will be going forward.

Dated: April 4, 2022

Wilmington, Delaware

/s/ Sean T. Greecher

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